

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 29, 1995

Mr. Fred Austin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Dear Mr. Austin,

In our February 28, 1995 meeting, Mr Willenberg asked Ash Grove to resubmit the August 11, 1994 study of its reported emission violations that would not be exceedances of Order #5730 limits. The data analysis as requested is attached and contains the following tables.

Table 1 - Monthly Tabulation of Reported Exceedances (Current Permit) is a tabulation of all exceedances reported by Ash Grove between November 1993 and January 1995 according to Order #3382.

Table 2 - Monthly Tabulation of Reported Exceedances (Analyzer Malfunctions Eliminated) excludes CEM malfunctions. In early reports, analyzer violations were shown. It was agreed that, until PSAPCA adopts a definition of a CEM violation, those reported would not be considered violations and future monthly CEM-1 reports would not count CEM down time as violations.

Table 3 - Tabulation of Reported Exceedances (Mass Limits Eliminated) shows the number of exceedances remaining with the elimination of these limits.

Table 4 - Monthly Tabulation of Reported Exceedances (At New PPM Limits) shows the number of violations that would have been reported under the revised NOx, CO and SO2 limits in Order #5730 .

Table 5 - Monthly Tabulation of Reported Exceedances (Start up/Shutdown/ Maintenance Eliminated) shows the effect of eliminating exceedances that occurred under these conditions.

Table 6 - Monthly Tabulation of Reported Exceedances (Reduced to Incidents) shows the number of discrete incidents associated with all the exceedances reported in Table 5. At the June 24, 1994 meeting between Jim Nolan, Jay Willenberg and Matt Cohen, Jay and Jim agreed that only one penalty should be assessed for a single emission incident, even if it includes multiple consecutive exceedances of a short term emissions limit.

Table 7 - Monthly Tabulation of Incidents (Upsets Eliminated) shows the effect of eliminating those incidents that should be excused from penalty under WAC 173-400-107.

We hope this letter provides the information Mr. Willenberg requested. Should additional data be required, please call me.

Yours truly,



Gerald J. Brown
Manager, Safety and Environmental

Copy: EP
NF
HES
MC

Table 1: Monthly Tabulation of Reported Exceedences (Current Permit)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	lb/hr 1Hr	NOx ppmc 1Hr	lb/hr 1Hr	ppmc 1Day	lb/hr 1Day	CO ppmc 8Hr	lb/hr 8Hr
Nov 93	0	0	79	150	30	7	1	1	1	1
Dec 93	2	3	26	17	12	0	1	0	0	0
Jan 94	0	0	15	11	4	3	1	0	0	0
Feb 94	0	0	13	6	12	9	1	0	0	0
Mar 94	24	9	10	3	24	10	1	1	14	9
Apr 94	0	0	12	5	1	0	1	0	0	0
May 94	10	6	48	36	14	1	4	1	0	0
Jun 94	2	2	19	15	8	0	1	0	0	0
Jul 94	0	0	5	3	1	0	0	0	0	0
Aug 94	0	0	9	6	0	0	0	0	0	0
Sep 94	2	2	14	4	0	0	0	0	0	0
Oct 94	0	0	15	6	0	0	0	0	0	0
Nov 94	1	0	4	4	0	0	0	0	0	0
Dec 94	0	0	15	9	0	0	0	0	0	0
Jan 95	7	0	4	2	1	1	0	0	0	0
Total	48	22	288	277	107	31	11	3	15	10

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Table 2: Monthly Tabulation of Reported Exceedences (Analyzer Malfunctions Eliminated)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	lb/hr 1Hr	NOx ppmc 1Hr	lb/hr 1Hr	ppmc 1Day	lb/hr 1Day	CO ppmc 8Hr	lb/hr 8Hr
Nov 93	0	0	0	0	30	7	1	1	1	6
Dec 93	2	3	13	17	12	0	1	0	0	0
Jan 94	0	0	15	11	4	3	1	0	0	0
Feb 94	0	0	13	6	12	9	1	0	0	0
Mar 94	24	9	10	3	24	10	1	1	14	10
Apr 94	0	0	12	5	1	0	1	0	0	0
May 94	10	6	48	24	14	1	4	1	0	0
Jun 94	2	2	19	15	8	0	1	0	0	0
Jul 94	0	0	5	3	1	0	0	0	0	0
Aug 94	0	0	9	6	0	0	0	0	0	0
Sep 94	2	2	14	4	0	0	0	0	0	0
Oct 94	0	0	15	6	0	0	0	0	0	0
Nov 94	1	0	4	4	0	0	0	0	0	0
Dec 94	0	0	15	9	0	0	0	0	0	0
Jan 95	0	0	4	2	1	1	0	0	0	0
Total	41	22	196	115	107	31	11	3	15	16

Table 7 - Monthly Tabulation of Incidents (Upsets Eliminated) shows the effect of eliminating those incidents that should be excused from penalty under WAC 173-400-107.

We hope this letter provides the information Mr. Willenberg requested. Should additional data be required, please call me.

Yours truly,

A handwritten signature in dark ink, appearing to read "Gerald J. Brown", with a stylized, flowing script.

Gerald J. Brown
Manager, Safety and Environmental

Copy: EP
NF
HES
MC

Table 1: Monthly Tabulation of Reported Exceedences (Current Permit)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	lb/hr 1Hr	NOx ppmc 1Hr	lb/hr 1Hr	ppmc 1Day	lb/hr 1Day	CO ppmc 8Hr	lb/hr 8Hr
Nov 93	0	0	79	150	30	7	1	1	0	1
Dec 93	2	3	26	17	12	0	1	0	0	0
Jan 94	0	0	15	11	4	3	1	0	0	0
Feb 94	0	0	13	6	12	9	1	0	0	0
Mar 94	24	9	10	3	24	10	1	1	14	9
Apr 94	0	0	12	5	1	0	1	0	0	0
May 94	10	6	48	36	14	1	4	1	0	0
Jun 94	2	2	19	15	8	0	1	0	0	0
Jul 94	0	0	5	3	1	0	0	0	0	0
Aug 94	0	0	9	6	0	0	0	0	0	0
Sep 94	2	2	14	4	0	0	0	0	0	0
Oct 94	0	0	15	6	0	0	0	0	0	0
Nov 94	1	0	4	4	0	0	0	0	0	0
Dec 94	0	0	15	9	0	0	0	0	0	0
Jan 95	7	0	4	2	1	1	0	0	0	0
Total	48	22	288	277	107	31	11	3	15	10

812

Table 2: Monthly Tabulation of Reported Exceedences (Analyzer Malfunctions Eliminated)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	lb/hr 1Hr	NOx ppmc 1Hr	lb/hr 1Hr	ppmc 1Day	lb/hr 1Day	CO ppmc 8Hr	lb/hr 8Hr
Nov 93	0	0	0	0	30	7	1	1	0	6
Dec 93	2	3	13	17	12	0	1	0	0	0
Jan 94	0	0	15	11	4	3	1	0	0	0
Feb 94	0	0	13	6	12	9	1	0	0	0
Mar 94	24	9	10	3	24	10	1	1	14	10
Apr 94	0	0	12	5	1	0	1	0	0	0
May 94	10	6	48	24	14	1	4	1	0	0
Jun 94	2	2	19	15	8	0	1	0	0	0
Jul 94	0	0	5	3	1	0	0	0	0	0
Aug 94	0	0	9	6	0	0	0	0	0	0
Sep 94	2	2	14	4	0	0	0	0	0	0
Oct 94	0	0	15	6	0	0	0	0	0	0
Nov 94	1	0	4	4	0	0	0	0	0	0
Dec 94	0	0	15	9	0	0	0	0	0	0
Jan 95	0	0	4	2	1	1	0	0	0	0
Total	41	22	196	115	107	31	11	3	15	16

Table 3: Monthly Tabulation of Reported Exceedences (Mass Limits Eliminated)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov 93	0	0	0	30	1	1
Dec 93	2	3	13	12	1	0
Jan 94	0	0	15	4	1	0
Feb 94	0	0	13	12	1	0
Mar 94	24	9	10	24	1	14
Apr 94	0	0	12	1	1	0
May 94	10	6	48	14	4	0
Jun 94	2	2	19	8	1	0
Jul 94	0	0	5	1	0	0
Aug 94	0	0	9	0	0	0
Sep 94	2	2	14	0	0	0
Oct 94	0	0	15	0	0	0
Nov 94	1	0	4	0	0	0
Dec 94	0	0	15	0	0	0
Jan 95	0	0	4	1	0	0
Total	41	22	196	107	11	15

Table 4: Monthly Tabulation of Reported Exceedences (At New PPM Limits)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov 93	0	0	0	30	1	1
Dec 93	2	3	0	12	1	0
Jan 94	0	0	0	2	0	0
Feb 94	0	0	0	12	1	0
Mar 94	24	9	2	22	1	14
Apr 94	0	0	0	1	0	0
May 94	10	6	1	13	4	0
Jun 94	2	2	0	8	0	0
Jul 94	0	0	0	1	0	0
Aug 94	0	0	0	0	0	0
Sep 94	2	2	1	0	0	0
Oct 94	0	0	0	0	0	0
Nov 94	1	0	0	0	0	0
Dec 94	0	0	0	0	0	0
Jan 95	0	0	0	1	0	0
Total	41 ✓	22	4 ✓	102 ✓	8 ✓	15 ✓

**Table 5: Monthly Tabulation of Reported Exceedences
(Startup/Shutdown/Maintenance Eliminated)**

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov 93	0	0	0	0	0	1
Dec 93	2	3	0	7	1	0
Jan 94	0	0	0	2	0	0
Feb 94	0	0	0	5	0	0
Mar 94	24	9	0	7	0	14
Apr 94	0	0	0	1	0	0
May 94	10	6	0	5	4	0
Jun 94	2	2	0	0	0	0
Jul 94	0	0	0	0	0	0
Aug 94	0	0	0	0	0	0
Sep 94	0	0	0	0	0	0
Oct 94	0	0	0	0	0	0
Nov 94	0	0	0	0	0	0
Dec 94	0	0	0	0	0	0
Jan 95	0	0	0	0	0	0
Total	38	20	0	27	5	15

Table 6: Monthly Tabulation of Reported Exceedences (Reduced to Incidents)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov 93	0	0	0	0	0	1
Dec 93	1	1	0	2	1	0
Jan 94	0	0	0	1	0	0
Feb 94	0	0	0	1	0	0
Mar 94	1	1	0	2	0	1
Apr 94	0	0	0	1	0	0
May 94	1	1	0	3	3	0
Jun 94	1	1	0	0	0	0
Jul 94	0	0	0	0	0	0
Aug 94	0	0	0	0	0	0
Sep 94	0	0	0	0	0	0
Oct 94	0	0	0	0	0	0
Nov 94	0	0	0	0	0	0
Dec 94	0	0	0	0	0	0
Jan 95	0	0	0	0	0	0
Total	4	4	0	10	4	2

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Table 7: Monthly Tabulation of Incidents (Upsets Eliminated)

Month	Opacity 5% 1Hr	10% 3Min	SO2 ppmc 1Hr	NOx ppmc 1Hr	ppmc 1Day	CO ppmc 8Hr
Nov 93	0	0	0	0	0	1
Dec 93	0	0	0	2	1	0
Jan 94	0	0	0	1	0	0
Feb 94	0	0	0	1	0	0
Mar 94	0	0	0	1	0	0
Apr 94	0	0	0	3	3	0
May 94	0	1	0	0	0	0
Jun 94	1	0	0	0	0	0
Jul 94	0	0	0	0	0	0
Aug 94	0	0	0	0	0	0
Sep 94	0	0	0	0	0	0
Oct 94	0	0	0	0	0	0
Nov 94	0	0	0	0	0	0
Dec 94	0	0	0	0	0	0
Jan 95	0	0	0	0	0	0
Total	1	1	0	9	4	1

16
total